

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION

EUREKA DATABASE SOLUTIONS, LLC,

Plaintiff,

v.

HAIVISION NETWORK VIDEO, INC.,

Defendant.

Case No. 6:19-CV-00576-ADA

JURY TRIAL DEMANDED

**AGREED MOTION FOR EXTENSION OF TIME TO FILE AN ANSWER OR  
OTHERWISE RESPOND TO PLAINTIFF'S ORIGINAL COMPLAINT**

TO THE HONORABLE JUDGE OF SAID COURT:

Defendant Haivision Network Video, Inc. ("Haivision") and Plaintiff Eureka Database Solutions, LLC ("Eureka") have agreed to a 30-day extension of time for Defendant Haivision to file an Answer or otherwise respond to Plaintiff's Original Complaint, and hereby moves this Court for an Order Extending the Deadline for it to File an Answer or otherwise respond to Plaintiff's Original Complaint until November 28, 2019. In support hereof, Haivision would state as follows:

1. This lawsuit was filed on October 7, 2019. It was served on Defendant Haivision through its registered agent on October 8, 2019. The answer would therefore be due on October 29, 2019.

2. Counsel for Haivision conferred with Counsel for Eureka on October 22, 2019, and agreed to a 30-day extension of time to file an Answer or otherwise respond to Plaintiff's Original Complaint.

Accordingly, Defendant Haivision requests this Court extend the deadline for it to respond to the Plaintiff's Original Complaint by thirty (30) days until November 28, 2019.

Dated October 25, 2019

Respectfully submitted,

GREENBERG TRAURIG, LLP

/s/ Janis Clements

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*Attorneys for Defendant Haivision Network Video, Inc.*

### **CERTIFICATE OF CONFERENCE**

Counsel for Plaintiff Eureka Database Solutions, LLC was consulted and received a voice mail indicating to Defendant's counsel that they would agree to a thirty (30) day extension of time for Defendant to respond to its Complaint.

/s/ Janis Clements

Janis Clements

### **CERTIFICATE OF SERVICE**

I hereby certify that on October 25, 2019, a true and correct copy of the foregoing document was electronically filed with the Court and that counsel of record who are deemed to have consented to electronic service are being served via the Court's CM/ECF system.

/s/ Janis Clements

Janis Clements